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Attorney for THE NESHANIAN LAW FIRM, INC., Secured Creditor

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA – SANTA ANA DIVISION

In re:) Case No.: 8:24-bk-12527-SC
Kristina Lynn Smith) CHAPTER 7
Debtor.) SECURED CREDITOR THE
) NESHANIAN LAW FIRM, INC.'S
) OBJECTION TO TRUSTEE'S MOTION
) FOR ORDER AUTHORIZING SALE OF
) REAL PROPERTY LOCATED AT 27591
) KATHY COURT, LAGUNA NIGUEL,
) CALIFORNIA 92677, ETC.
) Date: January 15, 2026
) Time: 9:00 a.m,
) Location: 411 West Fourth Street
) Santa Ana, CA 92701
) Courtroom: 5C

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1 **TO THE COURT AND ALL INTERESTED PARTIES, AND THEIR COUNSEL**
2 **OF RECORD, IF ANY:**

3 **PLEASE TAKE NOTICE** that secured creditor The Neshanian Law Firm, Inc. hereby
4 objects to the Trustee's Motion for Order Authorizing Sale of Real Property Located at 27591
5 [DOC Kathy Court, Laguna Niguel, California 92677, etc. [DOC 139] on the grounds that it
6 misstates the actual value of its secured lien to be satisfied as the claim [Claim 2-1] has accrued
7 judgment interest of \$20.19 per day since November 5, 2024 when it was first filed with this
8 court. As of January 1, 2026, the actual value of The Neshanian Law Firm Inc.'s judgment lien
9 as reflected in its claim is \$106,708.22 and continues to accrue interest of \$20.19 thereafter until
10 paid in full. Thus, the Trustee's Motion understates the true value of The Neshanian Law Firm,
11 Inc.'s secured claim.

12 Dated: 12/29/2025


Eric Marcus Neshanian, Attorney for
THE NESHANIAN LAW FIRM, INC.

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
5 Corporate Park, Ste. 250, Irvine, CA 92606

A true and correct copy of the foregoing document entitled (*specify*):

SECURED CREDITOR THE NESHANIAN LAW FIRM, INC.'S OBJECTION TO TRUSTEE'S MOTION FOR ORDER
AUTHORIZING SALE OF REAL PROPERTY LOCATED AT 27591 KATHY COURT, LAGUNA NIGUEL, CALIFORNIA
92677, ETC.

will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) _____, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☐ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On (date) 12/30/2025, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

1. The Honorable Scott C. Clarkson, United States Bankruptcy Court, Central District of California, Ronald Reagan Federal Building and Courthouse, 411 W. 4th St., Ste. 5130, Courtroom 5C, Santa Ana, CA 92701-4593
2. Yosina M. Lissebeck. Dinsmore & Shohl, LLP, 655 W. Broadway, Ste. 800, San Diego, CA 92101
3. Office of United States Trustee, 411 W. 4th St., Ste. 7160, Santa Ana, CA 92701

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

12/30/2025 Eric Marcus Neshanian, Esq.
Date Printed Name


Signature